

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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U.S. DISTRICT COURT  
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DEMOCRATIC NATIONAL	)	Civil Action No.: 81-3876
COMMITTEE,	)	JUDGE DICKINSON R.
<i>et al.</i> ,	)	DEBEVOISE
Plaintiffs,	)	
	)	
v.	)	
	)	
REPUBLICAN NATIONAL	)	
COMMITTEE,	)	
<i>et al.</i>	)	
Defendants.	)	
	)	

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**MOTION TO INTERVENE AND REOPEN CASE**

Disclosure of Location of Parties Under L.R. 10.1(A)

1. Ebony Malone is located at 7908 Euclid Avenue, Apartment 503, Cleveland, Ohio 44103.
2. Irving Agosta is located at 2234 West 20th Street, Cleveland, Ohio 44113.
3. Plaintiff Democratic National Committee has its principal place of business located at 430 South Capitol Street, S.E., Washington, D.C. 20003.
4. Defendant Republican National Committee has its principal place of business located at 310 First Street, S.E., Washington, D.C. 20003.

Motion

Proposed Intervenors, are newly registered African-American voters in Ohio who learned within the last few days that their names are on a 35,000-person list of challenged voters, which appears to have been compiled and used in violation

of Consent Decrees entered in this case. The fact that their names are on this challenge list places in jeopardy their right to vote on election day next Tuesday. Consequently, these voters move on an emergency basis to intervene in and reopen this case, and for expedited discovery for the purpose of enforcing the Consent Decrees. The Democratic National Committee ("DNC") was the Plaintiff in the original action. It entered into Consent Decrees with Defendant Republic National Committee ("RNC") designed to protect the rights of minority voters against intimidation and interference with their right to vote. The Consent Decrees were intended for the benefit of minority voters; and Intervenors respectfully request that this Court allow them to intervene under Fed. R. Civ. P. Rules 71 and 24.

Respectfully submitted,

John Nields / AM

John W. Nields, Jr.

Patricia G. Butler

Laura S. Shores

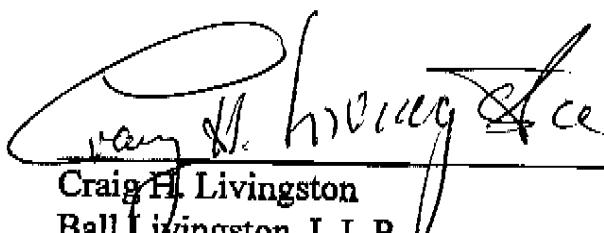
Ari N. Rothman

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Dated: October 27, 2004

Counsel for Intervenors

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 27th day of October, 2004, true copies of the foregoing Motion to Intervene and Reopen Case were served by messenger, facsimile and federal express, postage prepaid, upon each of the parties listed below:

Democratic National Committee  
430 South Capitol Street, S.E.  
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